

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

Richmond Division

2021 JAN 21 PM 12:57

Case No. 3:21-cv-046

(to be filled in by the Clerk's Office)

Kenneth L. Sanford

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

City Of Franklin Virginia
County Administrator Southampton County Virginia
Selective Insurance Company of America

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Kenneth L. Sanford		
Address	301 Beale Court		
	Franklin	Virginia	23851
	City	State	Zip Code
County	Southampton		
Telephone Number	757-275-4437		
E-Mail Address	gun_g@yahoo.com		

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	City of Franklin		
Job or Title (if known)			
Address	207 W. 2 nd Ave		
	Franklin	Virginia	23851
	City	State	Zip Code
County	Southampton		
Telephone Number	757-562-8561		
E-Mail Address (if known)	ajarratt@franklinva.com		
<input type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity			

Defendant No. 2

Name	Southampton County Administrator		
Job or Title (if known)			
Address	26022 Administration Center Dr		
	Courtland	Virginia	23837
	City	State	Zip Code
County	Southampton		
Telephone Number	757-653-3015		

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

E-Mail Address (if known)

☐ Individual capacity ☒ Official capacity

Defendant No. 3

Name

Selective Insurance Company of America

Job or Title (if known)

Address

100 Shockoe Slip Fl 2

Richmond

Virginia

23219

City

State

Zip Code

County

Richmond

Telephone Number

E-Mail Address (if known)

☐ Individual capacity ☐ Official capacity

Defendant No. 4

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

☐ Individual capacity ☐ Official capacity**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

I am suing under the 1964 Civil Rights Act for Discrimination and the 14th Amendment of the Constitution Equal Protection Under the Law.

- C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

N/A

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Mr. Sanford is suing the parties listed in this lawsuit for not standing with the rule of law set by the Government of the United States. Mr. Sanford has been exposed to Discrimination by the Court System of Southampton County. Mr. Sanford submitted a lawsuit against Selective Insurance Company and his information was leaked to an Employee's of the City of Franklin which Violates the Privacy Act Laws because it was done without Mr. Sanford permission. The City of Franklin then provided Lawyers to be Selective Insurance Company Lawyers which they could not do no State Agency can conduct business for a Private Company. Mr. Sanford questioned this to the Clerk of the Court for Southampton on this matter. Selective Insurance is in Default because they refuse to be served by Mr. Sanford therefore how can a Lawyer be assigned by Selective Insurance. The City Is a Third Party to this action because they have over stepped there authority is a Governing Body. The record will show that the Court has no attention on holding fair proceeding.

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

These events have taken place inside the Court system of the Circuit Court of Southampton County. Mr. Sanford has made many motion to this day no Judge has been assigned nor any response by the Court to his motion dealing with the Lawsuit he has submitted. Mr. Sanford filed his case on January 7, 2021 at 1:51pm.

- B. What date and approximate time did the events giving rise to your claim(s) occur?

As stated above the Lawsuit was submitted January 7, 2021

- C. What are the facts underlying your claim(s)? (For example: *What happened to you? Who did what? Was anyone else involved? Who else saw what happened?*)

The underlying facts are my Rights have been disregarded by the Circuit Court of Southampton Virginia due to the facts stated above that my information has been given out by the Court to a Third Party who steps in to Represent a Client that has not hired them to do so. The Court fails to provide information to the Plaintiff on who the Presiding Judge is and not responding to any on the Motions filed by the Mr. Sanford. The Court fills that it can do as it please due to the fact that Mr. Sanford represents himself Pro Se which is his right to do.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

No Physical injuries occurred just Mental Pain and Emotion

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Mr. Sanford is request a sum of 220,000,000.00 in Punitive Damages be paid in this case due to the violation of his Rights as a Citizen of The United States Of America.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 21 January 2021

Signature of Plaintiff



Printed Name of Plaintiff Kenneth L. Sanford

B. For Attorneys

Date of signing: 21 January 2021

Signature of Attorney



Printed Name of Attorney Kenneth L. Sanford Pro Se

Bar Number _____

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address